

DECLARATION OF DAN BILZERIAN

I, DAN BILZERIAN, declare under the penalty of perjury:

1. I am over 18 years of age, and I have personal knowledge of the facts and circumstances stated in this declaration.

2. I am the Plaintiff in the above-captioned action.

3. I am a resident of Nevada. I am the largest shareholder of Ignite International Brands, Ltd. ("Ignite Brands"), a lifestyle company selling disposable vapes, spirits, and apparel under the lifestyle brand "Ignite" that I founded in around 2017.

4. I am a former director and CEO of Ignite Brands. Ignite Brands is incorporated in British Columbia, with a principal place of business in Texas, the United States. To the best of my knowledge, Ignite Brands does not sell any products in British Columbia, or Canada. Ignite Brands' main connection to Canada is the fact that the company is incorporated there.

5. I have been involved with Ignite Brands since around 2017.

6. Until December 2023, I served as the nominal CEO of Ignite Brands. Until June 2024, I served as a Chairman of the Board of Ignite Brands. I was not directly involved in the company's operations except for product development and marketing.

7. Ignite International, LTD (“Ignite US”) is a wholly owned subsidiary of Ignite Brands

8. Within the corporate structure of Ignite Brands' business, Ignite US owns multiple intellectual property rights (trademarks, copyrights, etc.) that are then licensed to Ignite Brands.

9. Ignite Brands – depending on the line of products and immediate business needs – conducts its business either directly, or through its fully-owned subsidiaries such as Ignite US.

1 10. In the American market, Ignite US is responsible for sales of nicotine products
2 such as electronic cigarettes and vapes.

3 11. Since 2018, my brand "Ignite," as well as my name, likeness, personality, and
4 life story, have been the essence of Ignite Brands' business, and I have been the "public face"
5 of Ignite Brands. During my tenure as Ignite Brands' CEO, I allowed Ignite Brands to use my
6 name, likeness, image, signature, and distinctive marks on a goodwill basis – at no cost to the
7 company – for the purpose of marketing Ignite Brands' products and driving its sales and
8 growth. I have never transferred or assigned my rights to my own name, likeness, image,
9 signature, and distinctive marks, in whole or in part, to Ignite Brands or Ignite US for any
10 purposes.

12 12. I revoked Ignite Brands' and Ignite US's right to use my name and likeness in
13 December 2023 when I was removed from the position of Ignite Brands' CEO.

15 13. In the State of Nevada, Ignite US sells its nicotine products through an extensive
16 network of Terrible Herbst convenient stores.

17 14. Attached as Exhibit A to this declaration is a true and correct copy of the May
18 12, 2025 printout from Ignite Brand's own website located at <
19 <https://puffignite.co/pages/store-locator-1>> currently showing more than seventy stores
20 selling Ignite US's nicotine products in Nevada.

21 15. In the American market, Ignite Brands is responsible for sales of alcohol
22 products such as vodka and tequila.

24 16. Attached as Exhibit B to this declaration is a true and correct copy of the May
25 12, 2025 printout from Ignite Brands' own website located at <
26 <https://ignitespirits.co/pages/store-locator>> showing more than eighty stores selling Ignite
27 Canada's alcohol products in Nevada.

1 17. As a matter of fact, it appears that Nevada is one of the main Ignite Brands'
2 markets in the U.S.

3 18. To sell its products in Nevada, both Ignite US and Ignite Canada utilize its
4 distributor Summit Spirits and Wine, Inc. ("Summit Spirits") – a Nevada Corporation located
5 in Las Vegas, Nevada.

6 19. That both Ignite Brands and Ignite US extensively market their products in the
7 United States in general and Nevada specifically, through use of my likeness, such as my
8 pictures, videos, signatures, voice, and overall brand of mine.

9 20. Ignite's distributor Summit Spirits also utilized, until very recently, my name
10 and likeness to sell Ignite's products in Nevada. Attached as Exhibit C to this declaration is a
11 true and correct copy of December 20, 2024 printout from Summit Spirit's website located at
12 <<https://sswbeverage.com/ignite-spirits/>>, marketing Ignite's vodka with my name.

13 21. The Company still uses photographs of me to promote its brand on its website.
14 Attached as Exhibit D to this declaration is a true and correct copy of May 12, 2025 printout
15 from Ignite Brands's website located at <<https://ignitespirits.co/pages/about-ignite-spirits>>.

16 22. After this lawsuit was filed, Ignite Brands attempted to replace some of my
17 pictures with pictures of actors who are intended to resemble me. Attached as Exhibit E to this
18 declaration is a May 12, 2025 printout from Ignite Brands' website located at <<https://wearignite.co/collections/mens-1>>, showing a muscular, bearded brunet man marketing
19 Ignite Brand products. This man is undoubtedly intended by Ignite to resemble my previous
20 pictures on this website.

21 23. Ignite Brands has used my pictures and videos at tradeshows and have lied to
22 distributors saying that we are still working together.

24. Many of the pictures and videos that Ignite uses in advertising were taken in Las Vegas where I live.

25. Despite unlawfully removing me from Ignite Brands, the company, without my consent, continues to use my name, likeness, image in the form of pictures and videos on their social media accounts to promote sales of the company's products, including vapes, alcohol, clothing, and other products. For example, the company continues to use my name, likeness, and image on numerous websites and social media accounts that the Company controls (such as the Ignite International account on X, formerly Twitter). Examples of such use that were still present on Ignite's social media during the pendency of this lawsuit are attached as Exhibit F.

26. Ignite Brands and its agents have lied to distributors and suppliers that I am bound by non-compete agreements preventing me from competing with Ignite.

27. That at least since 2023, all significant business decisions at Ignite were made by Paul Bilzerian, Scott Rohleder, and later, since June of 2024 Rupy Dhadwar.

28. That Paul Bilzerian, despite not having any formal position with Ignite Brands, is the decision maker at Ignite Brands, and controls all aspects of its business, such as marketing, sales, distribution, finance and human resources.

29. I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 12, 2025, in Las Vegas, Nevada.

/s/ Dan Bilzerian

Dan Bilzerian

Exhibit A

WARNING: This product contains nicotine. Nicotine is an addictive chemical.

[Shop](#)[Where to Buy](#)[Wholesale](#)[About](#)[#No2Minors](#)[Anti Counterfeit](#)0 [Login](#)

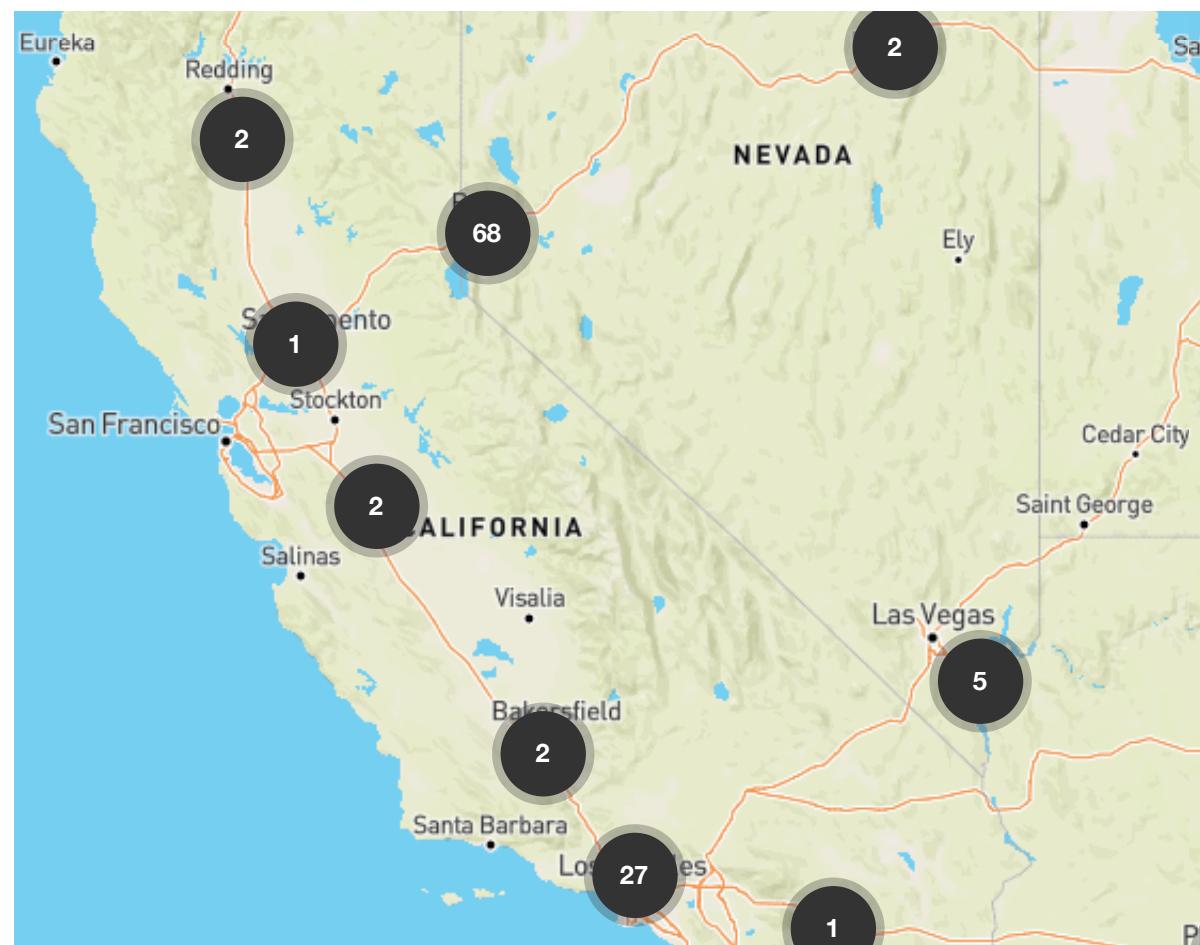
STORE LOCATOR

**Travel Centers of America****0108**

8050 Dean Martin Drive
I-15, Exit 33 (Blue Diamond
Road)
Las Vegas, NV 89139
United States

702-361-1176**Travel Centers of America****0331**

6595 North Hollywood Blvd
I-15, Exit 54 (Speedway Blvd.)



Las Vegas, NV 89115

United States

702-632-2640

Powered by Stockist.



When you need that unmistakable experience that only comes from IGNITE vapes, you need it **now**. But no worries if you've run out and live near one of the hundreds of stores across the country that carries this premium product.

VAPE SHOP NEAR ME

When looking for a vape shop near you that can provide you with the must-have IGNITE vape, use our online store locator. Find the quality, premium vape experience without the wait of delivery.

ORDER ONLINE FOR SELECTION AND CONVENIENCE

It's awesome to have a vape shop right down the street. But what if you don't have one conveniently located? Or what if they don't have your favorite flavor? Order online.

What if life is so f*cking busy that even a quick run to the store is out of the question? Have it shipped straight to you.

Favorites are great, whether it's a flavor or your perfect puff count. But what about new arrivals? Your **new** favorite may be online only. Order and have it conveniently delivered to your door.

THINGS TO KNOW WHEN BUYING VAPES FROM GAS STATIONS

If you run out of your favorite IGNITE vape, vape shops and gas stations can be great for easy, fast access. But they're sharing

shelf space with (ahem) other vape brands. So you may face limited IGNITE flavor and puff count selections. And as nice as they may be, the workers at a gas station are probably not exactly knowledgeable sources for vaping devices.

Find a vape shop near you featuring IGNITE vapes or order online. But no matter where you buy your IGNITE products, don't compromise. Never settle. IGNITE your life.



IGNITE INTERNATIONAL BRANDS LTD.

3308 Towerwood Drive
 Farmers' Branch, TX 75234-2317
 United States

675 Cochrane Drive, East Tower, Suite 639
 Markham, Ontario L3R 0B8
 Canada

VAPE[VAPE PENS](#)[VAPE PACKS](#)**CUSTOMER SERVICE**[SHIPPING & RETURNS](#)[PRIVACY POLICY](#)[TERMS OF SERVICE](#)[CONTACT US](#)[RETURNS OR EXCHANGES](#)

WARNING: Electronic Cigarettes and E-liquid products may contain nicotine, a chemical known to the State of California to cause birth defects or other reproductive harm. These products are not smoking cessation products and have not been tested as such. E-liquid products, electronic delivery devices, and accessories are intended for use by adults of legal smoking age (e.g., 21 years or older), and not by children, women who are pregnant or breastfeeding, or persons with or at risk of heart disease, high blood pressure, diabetes or taking medicine for depression or asthma, or who otherwise may be sensitive to nicotine. Nicotine is addictive and habit forming, and it is very toxic by inhalation, in contact with the skin, or if swallowed. Ingestion of the non-vaporized concentrated e-liquid ingredients can be poisonous. Keep away from children and pets. If ingested, immediately consult your doctor or vet. Nicotine can increase your heart rate and blood pressure and cause dizziness, nausea, and stomach pain. Inhalation of this product may aggravate existing respiratory conditions. These e-liquid products have not been evaluated by the Food and Drug Administration nor are they intended to treat, mitigate, prevent or cure any disease or condition.



Exhibit B

[ABOUT IGNITE](#)[OUR VODKA](#)[OUR TEQUILA](#)[RECIPES](#)[RETAILERS](#)[STORE LOCATOR](#)[SHOP TEQUILA](#)[SHOP VODKA](#)

STORE LOCATOR

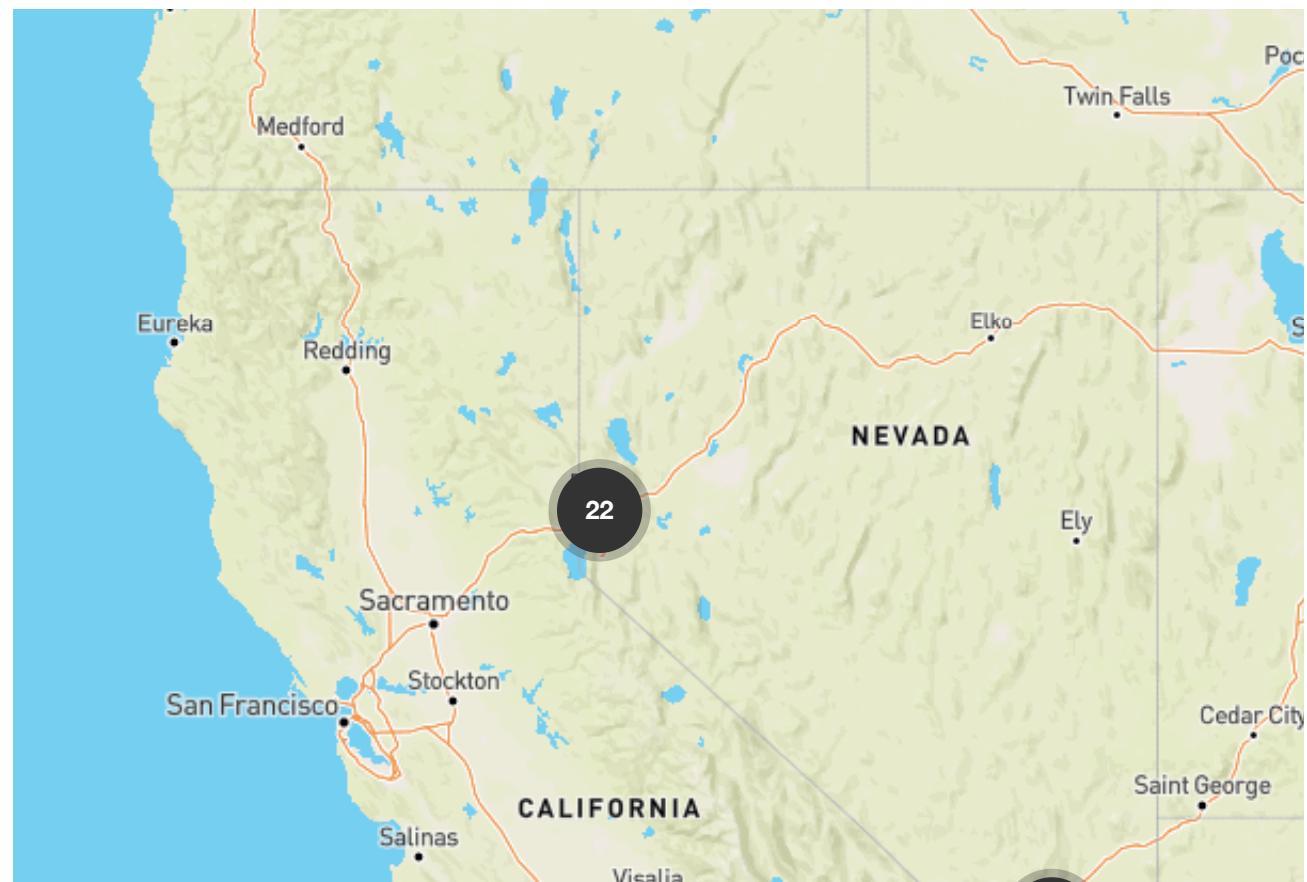
FIND IGNITE SPIRITS AT YOUR LOCAL RETAILER.



 **Moapa Travel Plaza**
VOF Hwy and Int 15
Moapa

 **Moapa Travel Plaza**
VOF Hwy and Int 15
Moapa

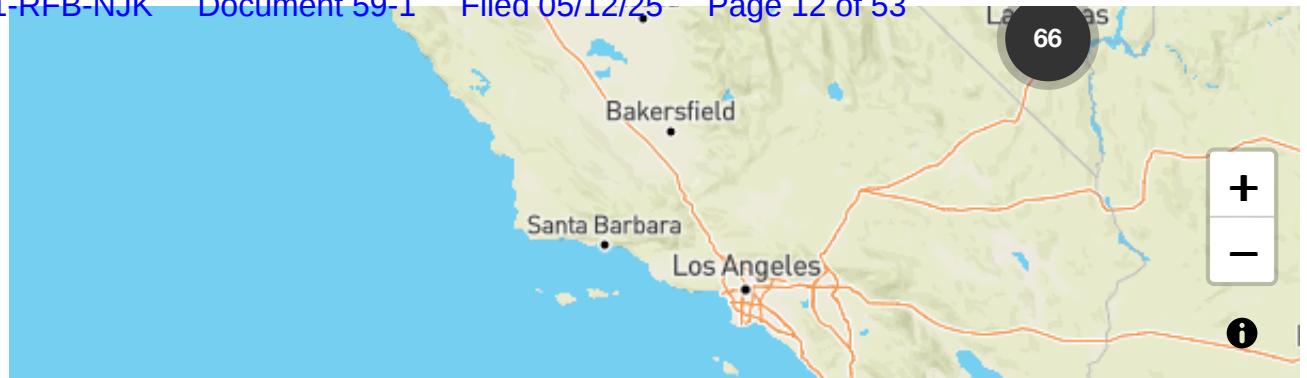
 **Lee's-Aliante**
2830 W Deer Springs
Rd.
Las Vegas



 **Lee's-Aliante**

2830 W Deer Springs
Rd.
Las Vegas

Powered by Stockist.



+ Do you ship to every state?

+ How quickly will I get my order?

+ Is a signature required?



+ Do I need to be home to receive my order?

+ Can I ship to a P.O. Box?

+ Can I get a Refund on my order?

+ Can I change my delivery address?

+ My product arrived damaged, can I return it?



+ I ordered multiple products but I only received some of them. What happens next?

+ Do you ship internationally?

+ How is this charge going to show in my bank statement?

**IGNITE INTERNATIONAL
BRANDS LTD.**

3308 Towerwood Drive
Farmers' Branch, TX
75234-2317
United States

675 Cochrane Drive, East
Tower, Suite 639
Markham, Ontario L3R
0B8
Canada

support@ignite.co

MAIN MENU

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[RECIPES](#)

[FOR RETAILERS](#)

[STORE LOCATOR](#)

LEGAL

[Privacy Policy](#)

[Terms of Service](#)



Must be 21 to enjoy. Please drink responsibly.

© 2025 Ignite International, Ltd.



Exhibit C



HOME

OUR BRANDS



“IT’S A LIFESTYLE.”
– DAN BILZERIAN

Exhibit D



ABOUT IGNITE

OUR VODKA

OUR TEQUILA

RECIPES

RETAILERS

STORE LOCATOR

SHOP TEQUILA

SHOP VODKA



ABOUT IGNITE

A global lifestyle brand unlike any other, IGNITE combines premium quality ingredients with an unprecedented level of ambition, innovation and an uncompromised standard of excellence. Inspired by its Founder, Dan Bilzerian, IGNITE has positioned itself as the gold standard and industry expert in Nicotine, Spirits, and supported with a premium apparel line for an active lifestyle.

IGNITE disrupts marketing norms with an authentic, quality-first mission, taking its expansion world-wide. Following its September 2018 US launch, 2019 saw expansion into Europe and Mexico, with continued expansion into the Caribbean, Middle East, Canada, Africa, and South America with many more to come in 2023

IGNITE is unapologetic in our attitude and in our promise to provide premium products and a high-quality experience to our customers.

It will always be the best or nothing for IGNITE.

SHOP SPIRITS



**IGNITE INTERNATIONAL
BRANDS LTD.**

3308 Towerwood Drive
Farmers' Branch, TX 75234-
2317
United States

675 Cochrane Drive, East
Tower, Suite 639
Markham, Ontario L3R 0B8
Canada

support@ignite.co

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Exhibit E



Workout Shorts- Red
\$60.00



Workout Shorts- White
\$60.00



Ignite Shorts - Orange
\$70.00



Workout Shorts- Alligator
\$60.00

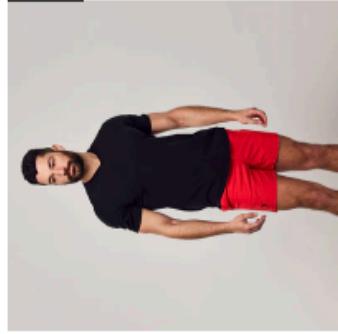


Workout Shorts- Midnight
\$60.00



Ignite Shorts - Blue
\$70.00

Sold Out



Essential Tee- Black
\$35.00
Sold Out



Workout Shorts- Blue
\$60.00



Ignite Shorts - Red
\$70.00

Exhibit F

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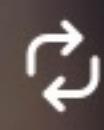
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International May 25



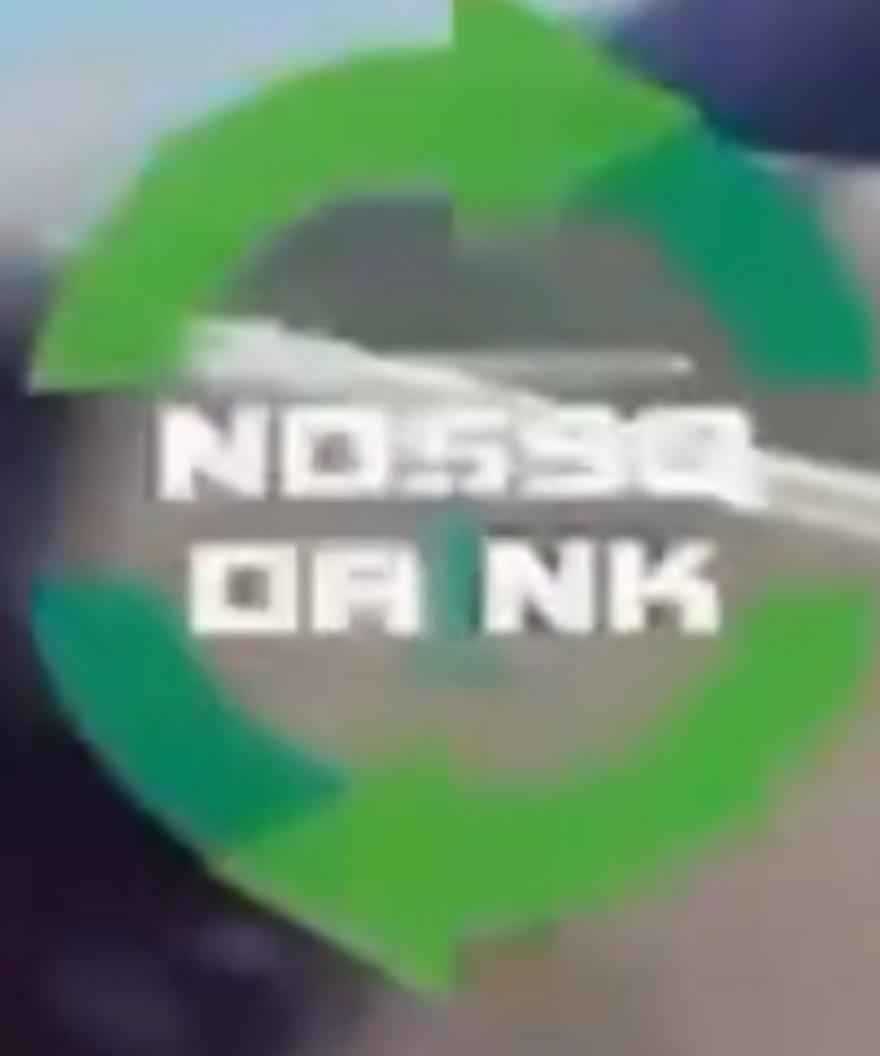
nossodrinkoficial

...



NAO COMPARTILHE BEBIDAS ALCOOLICAS COM MENORES DE 18 ANOS

IS HERE



Add to your story >



Send message...



7:32

57m

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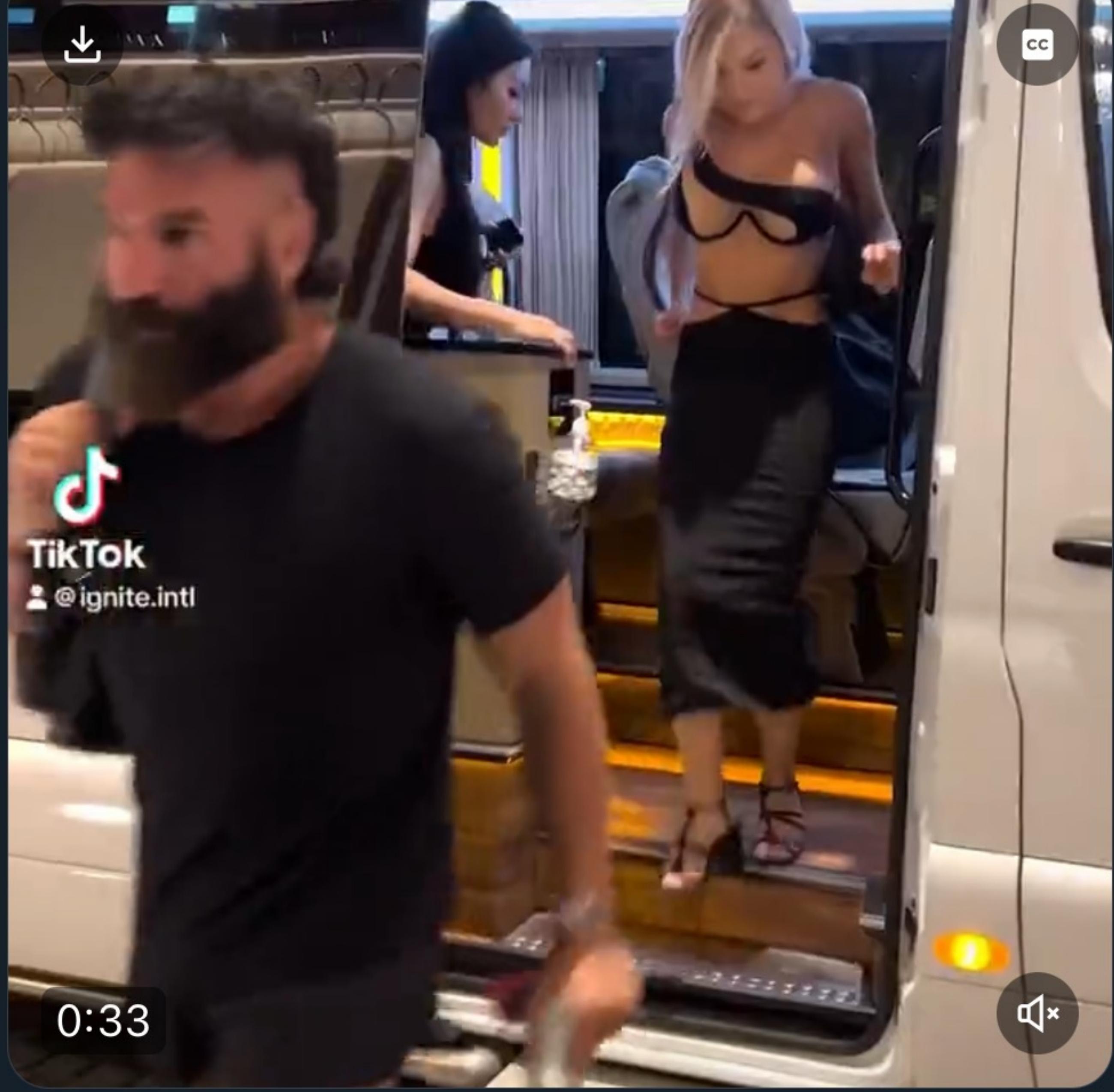
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Dubai

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Thank you for your service

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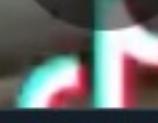
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Matias Ortiz @MatiasOrtiz1912 · 10/31/23

...



Taking advantage of the large number of people who attended the event, we carried out tastings of the Ignite products, the already well-known nicotine vapes, launching the vodka and tequila on the market, having a more than positive acceptance 

@Ignite_Intl x Boss Company PY

18



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Dubai

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I think it's special out of bed,
so turn around.

1 19 269 24K

24K

24K

24K

...

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Matias Ortiz @MatiasOrtiz1912 · 10/31/23

...

Taking advantage of the large number of people who attended the event, we carried out tastings of the Ignite products, the already well-known nicotine vapes, launching the vodka and tequila on the market, having a more than positive acceptance

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69

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Three amigos



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6.3K



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...

Three amigos

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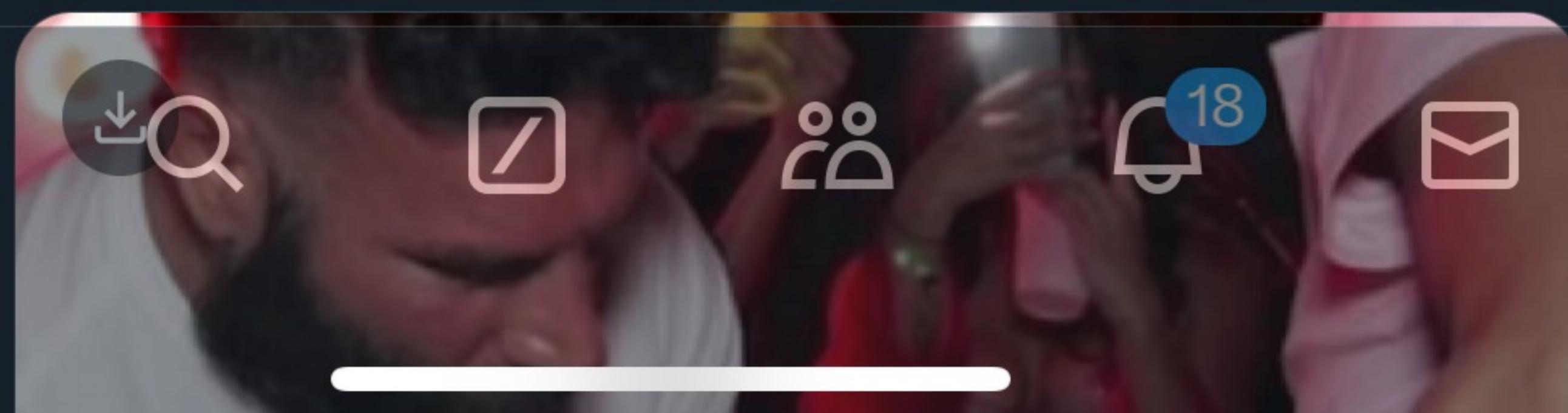
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Happy October



Your Life, Your Way



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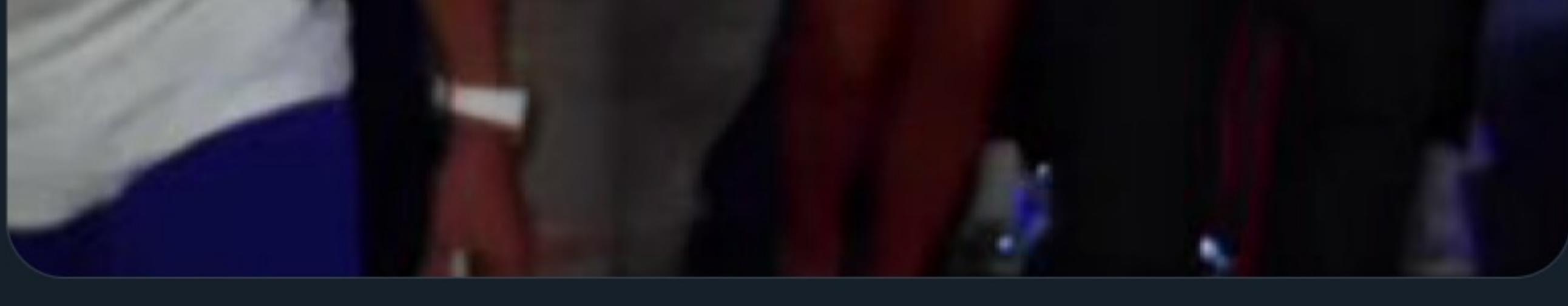


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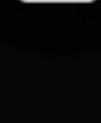


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10K



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Scorching 😅



18

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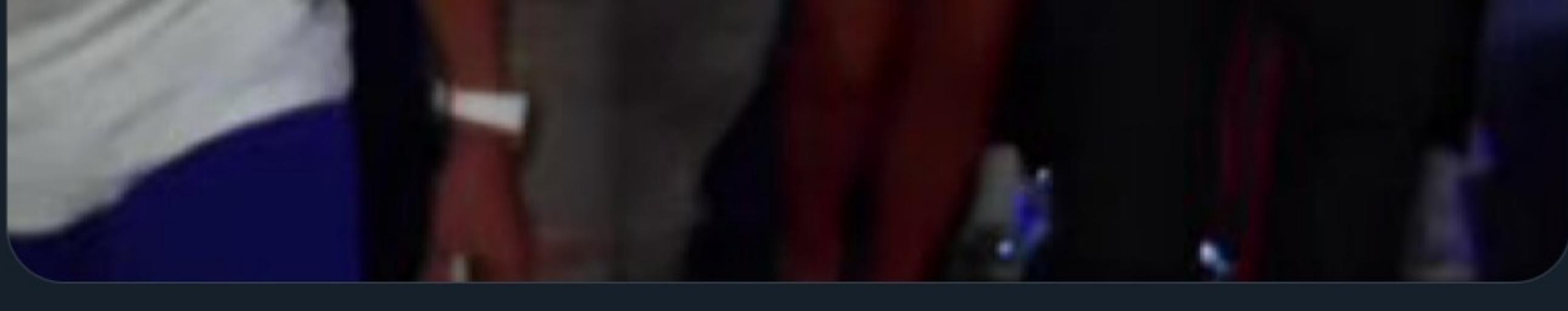
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Scorching 😅



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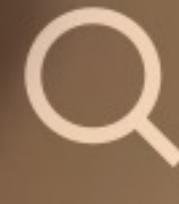
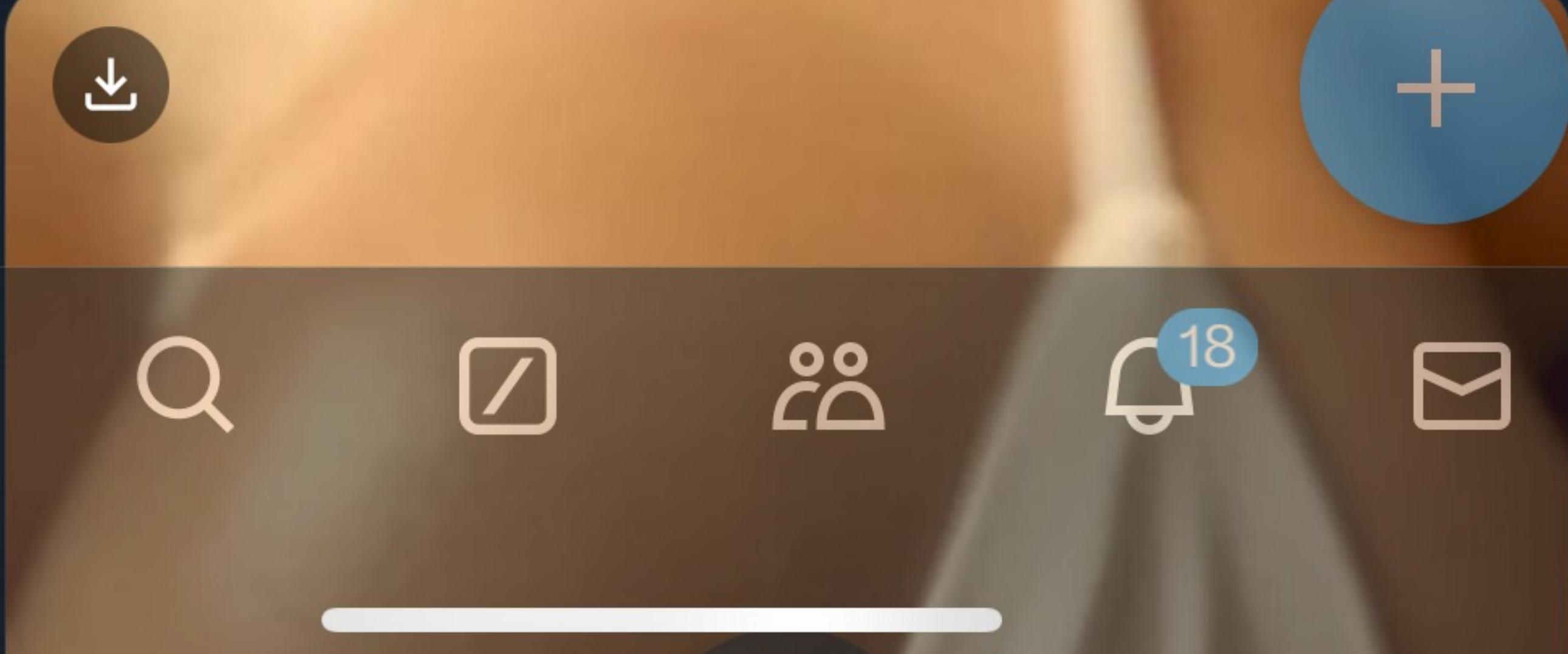


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From Dan Bilzerian



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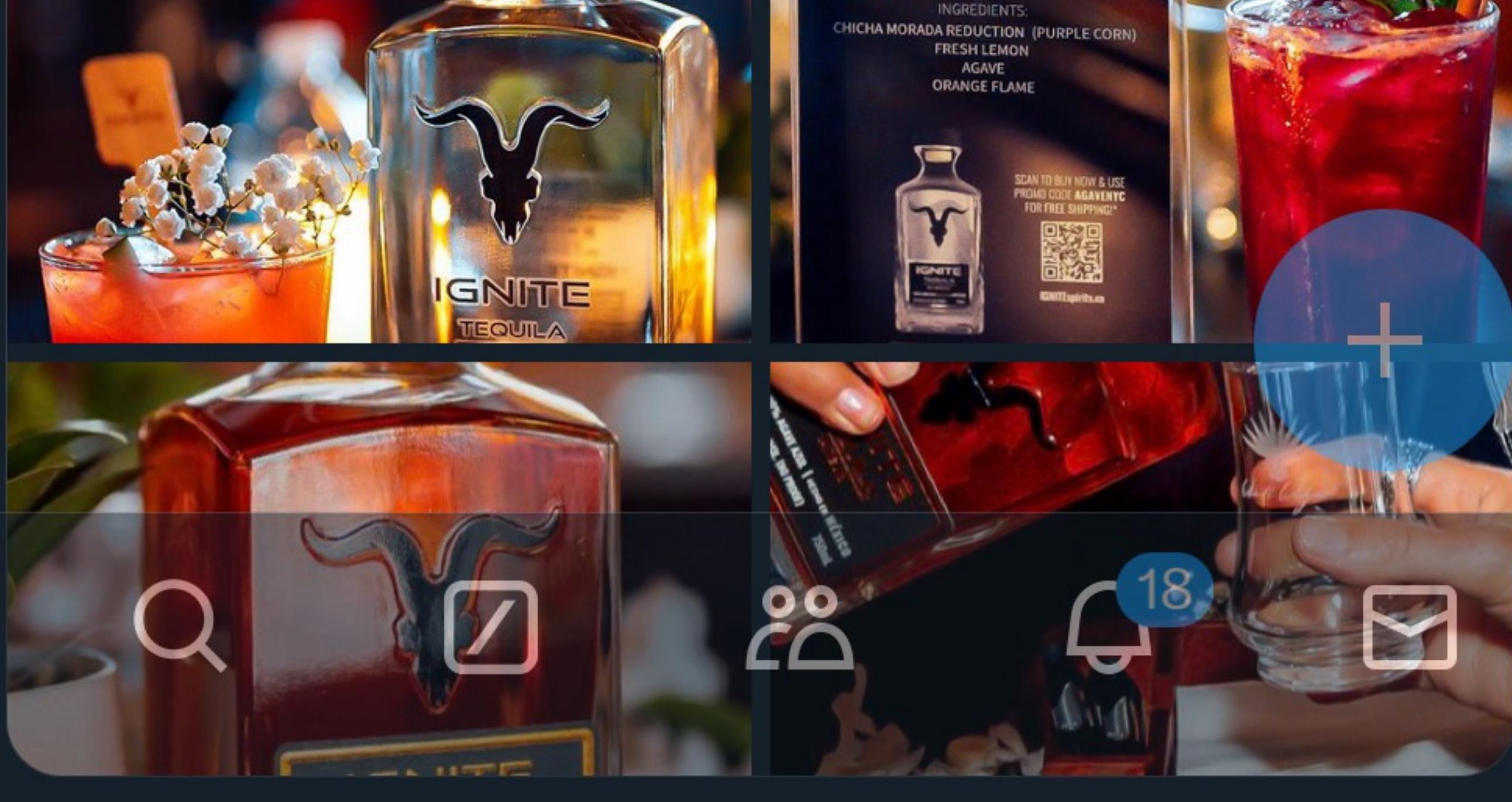


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📸: Arte Agave 2023 in NYC



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5



7:33

58m



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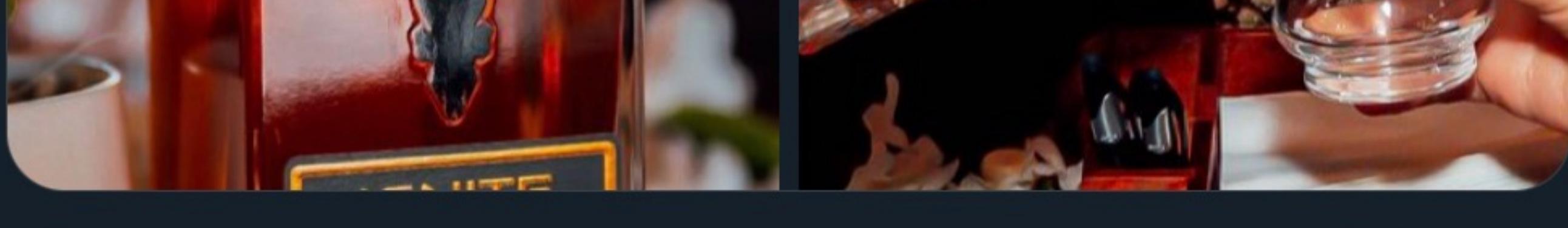
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5K



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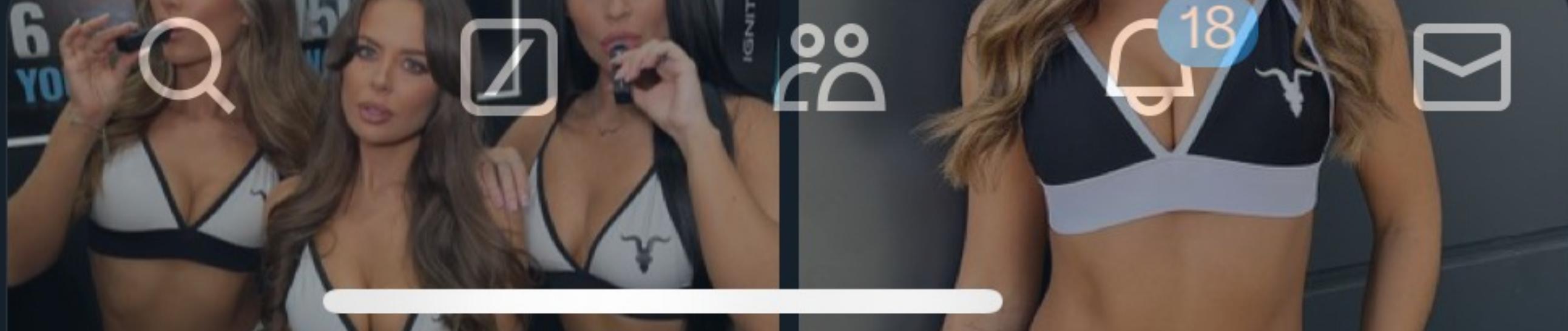
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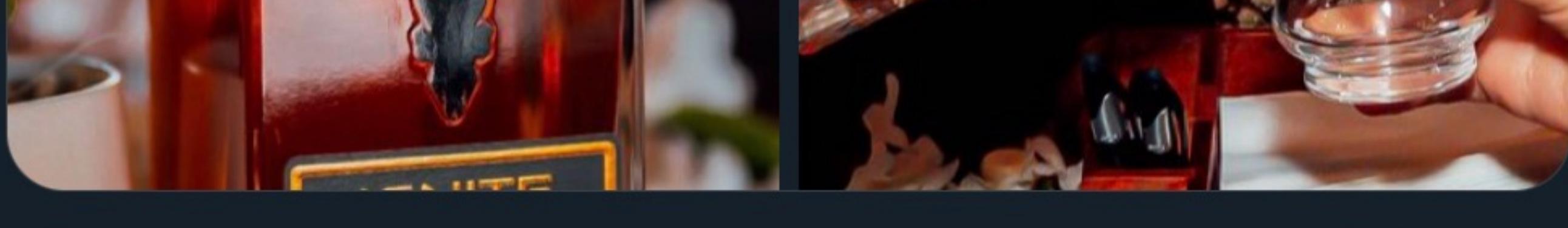
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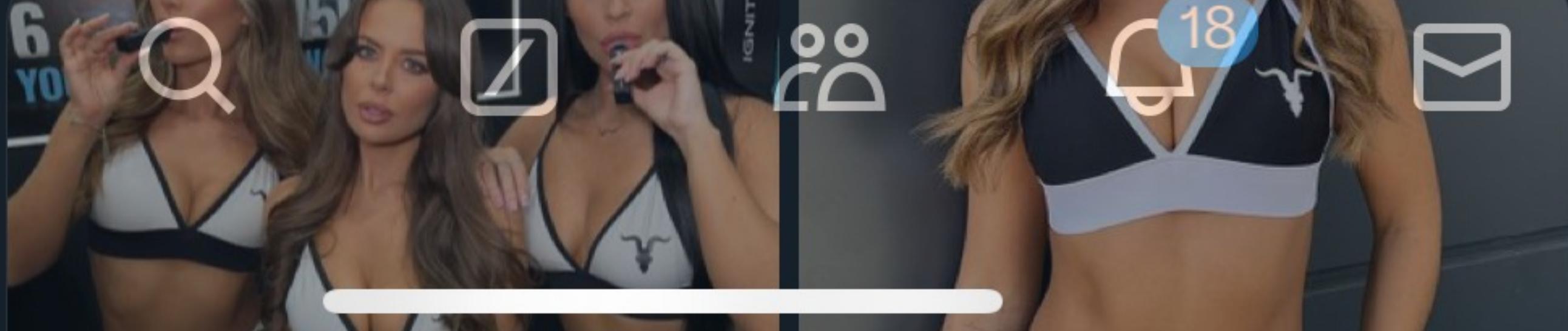
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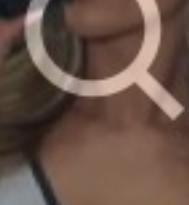
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InterTabac 2023

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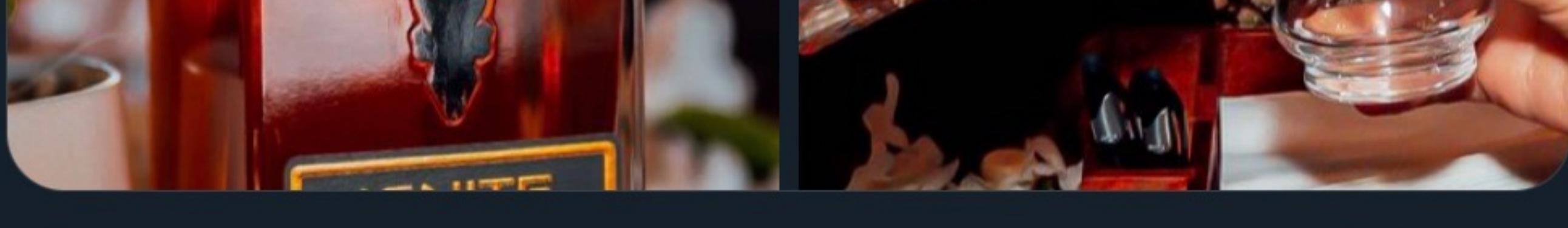
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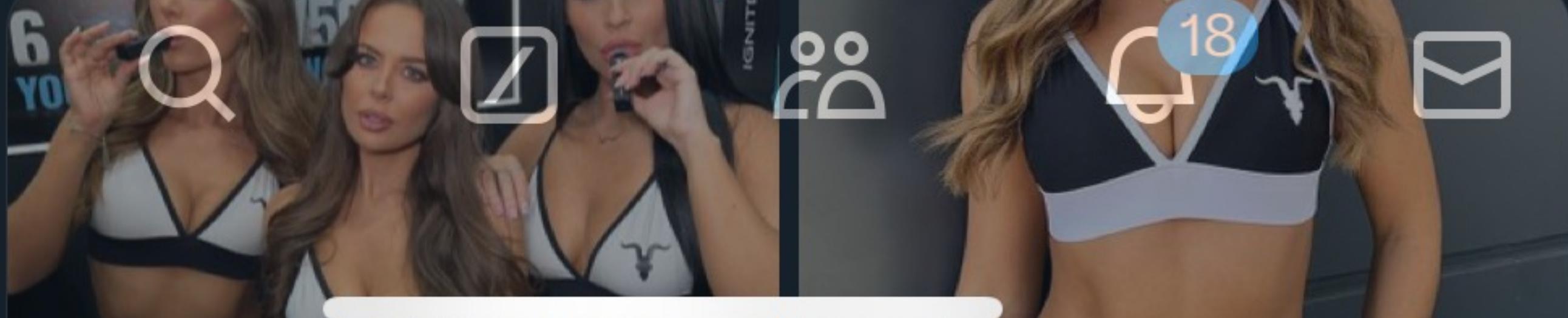
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InterTabac 2023

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Posts

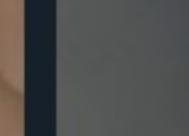
Replies

Highlights

Articles

Media

Likes



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58m



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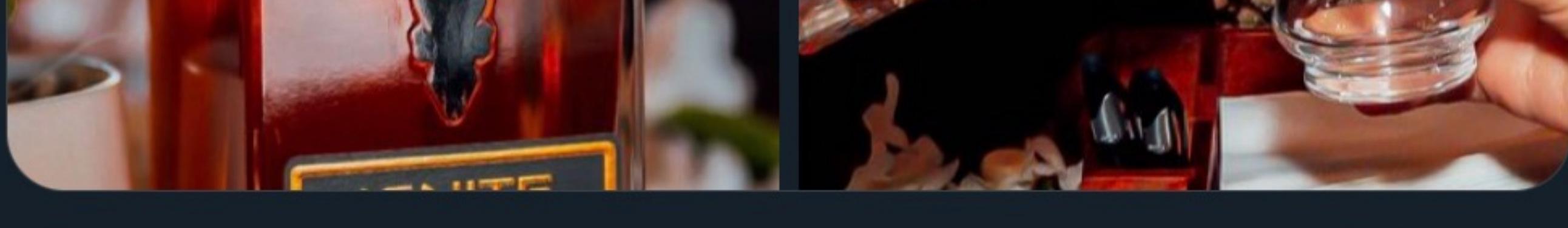


Ignite International

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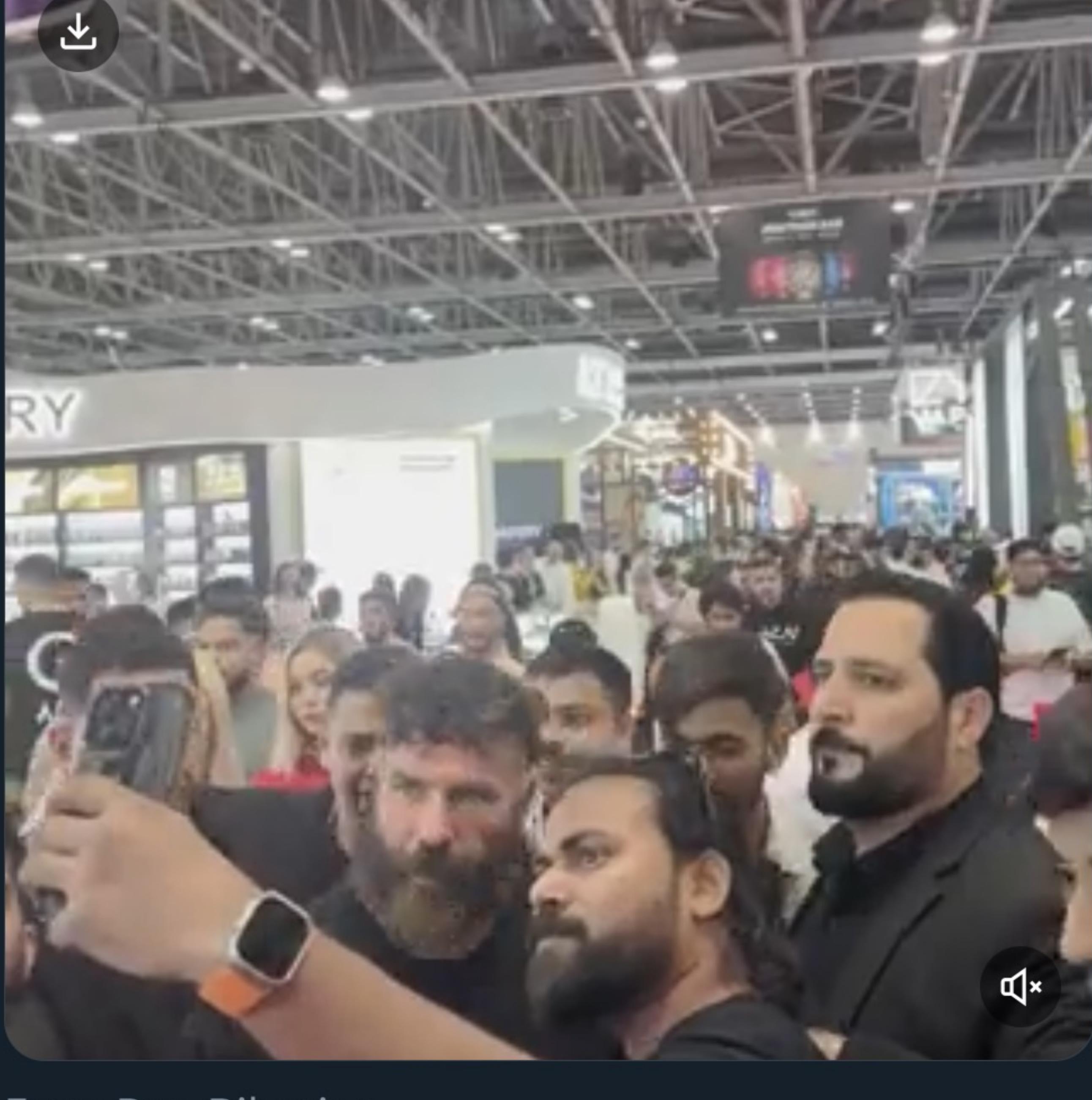
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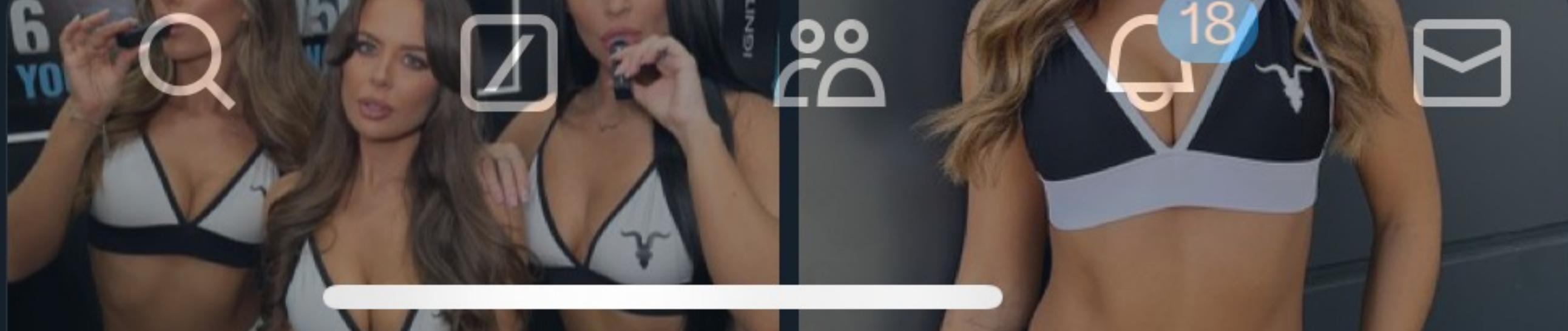
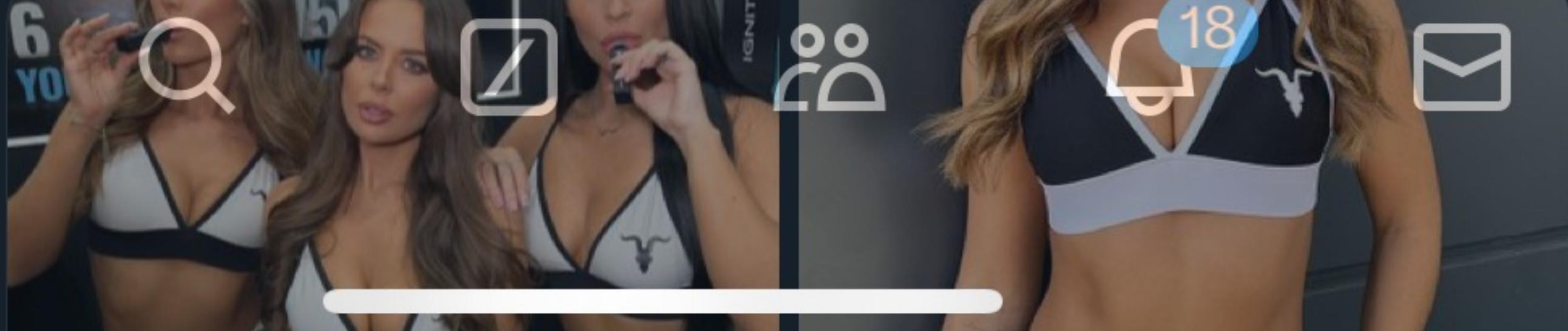
From Dan Bilzerian

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InterTabac 2023

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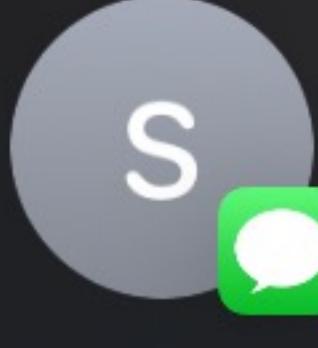
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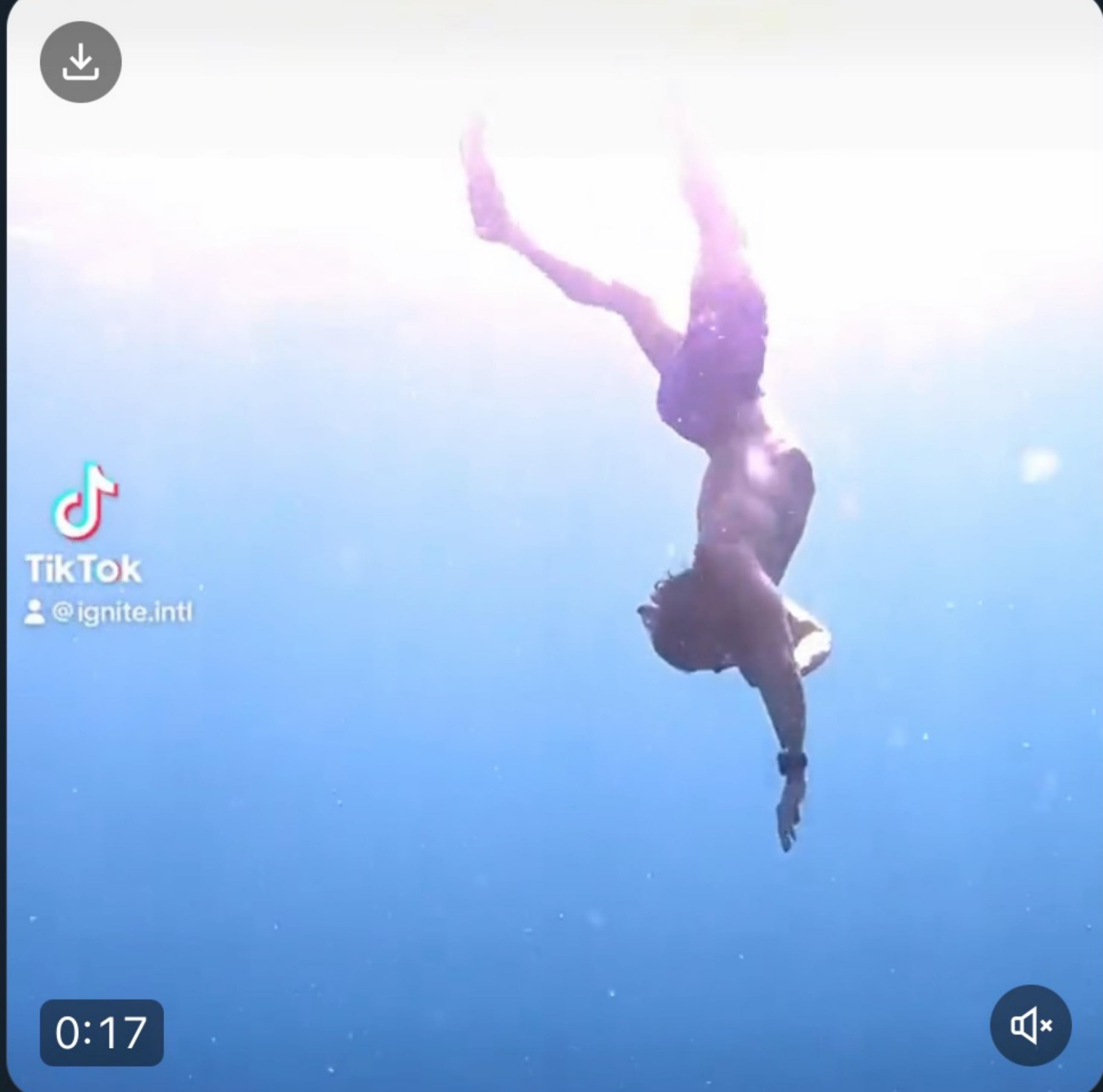
Security
iMessage

now

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everyday lives ...

— Jacques Cousteau



0:17



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13

5.4K



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Dan Bilzerian ✅ @DanBilzerian · 8/18/23

...

Q: If someone from the 1950s suddenly appeared today, what would be the most difficult thing to explain to them about life today?



A: I possess a device in my pocket that is capable of accessing



7:33

59m



52



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45

153

1.4K

680K

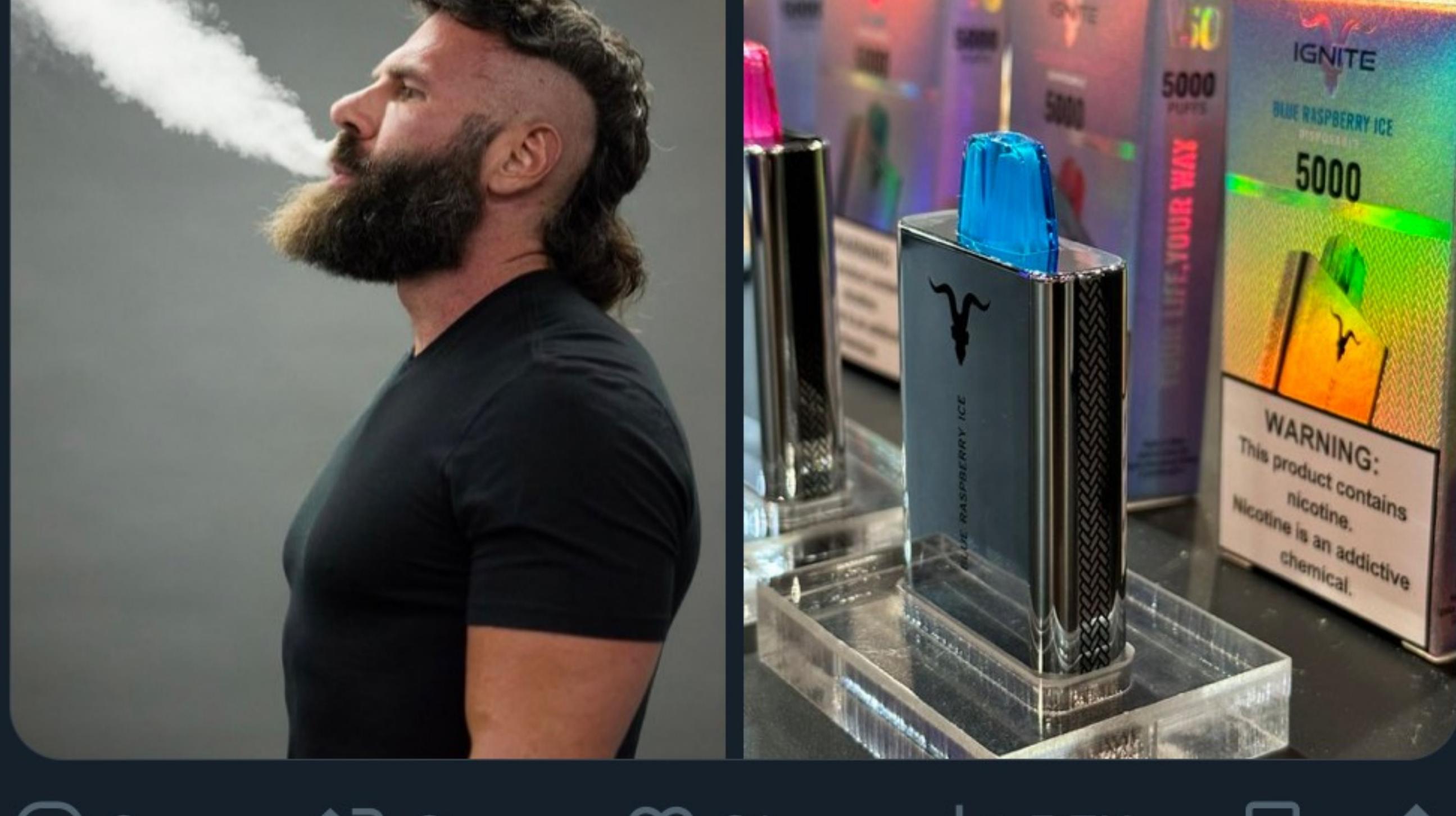


Ignite International @Ignite_Intl · 8/16/23

Best selling vapes in South America.

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2

3

21

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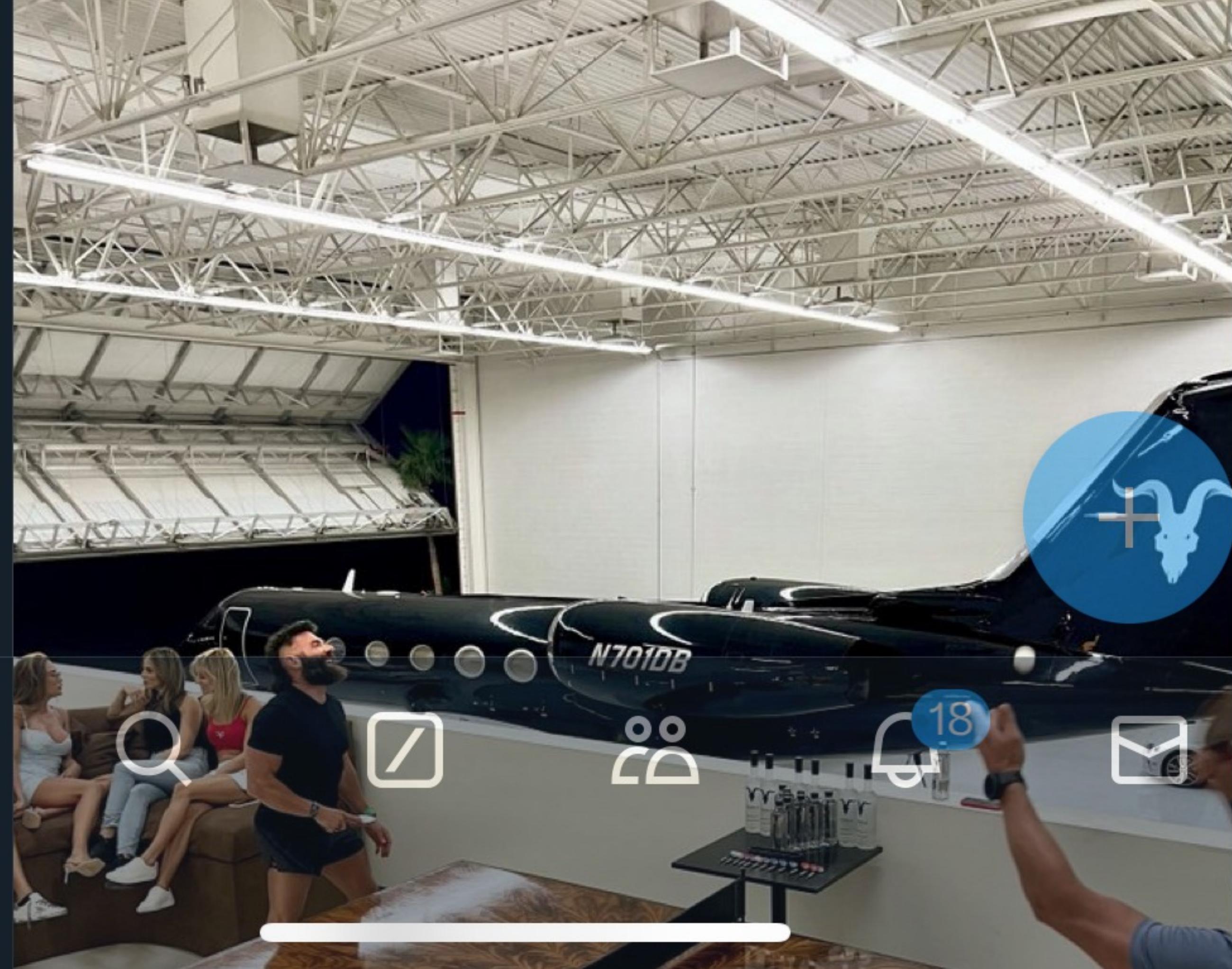


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Dan Bilzerian ✅ @DanBilzerian · 8/15/23

Good to be home

...



7:34

59m



52



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Dan Bilzerian ✅ @DanBilzerian · 7/27/23

Blend up a seedless watermelon add fresh coconut water 50\50. Best tasting and functional intraworkout drink hands down. Could add sea salt and fresh mint leaves

47

75

1.6K

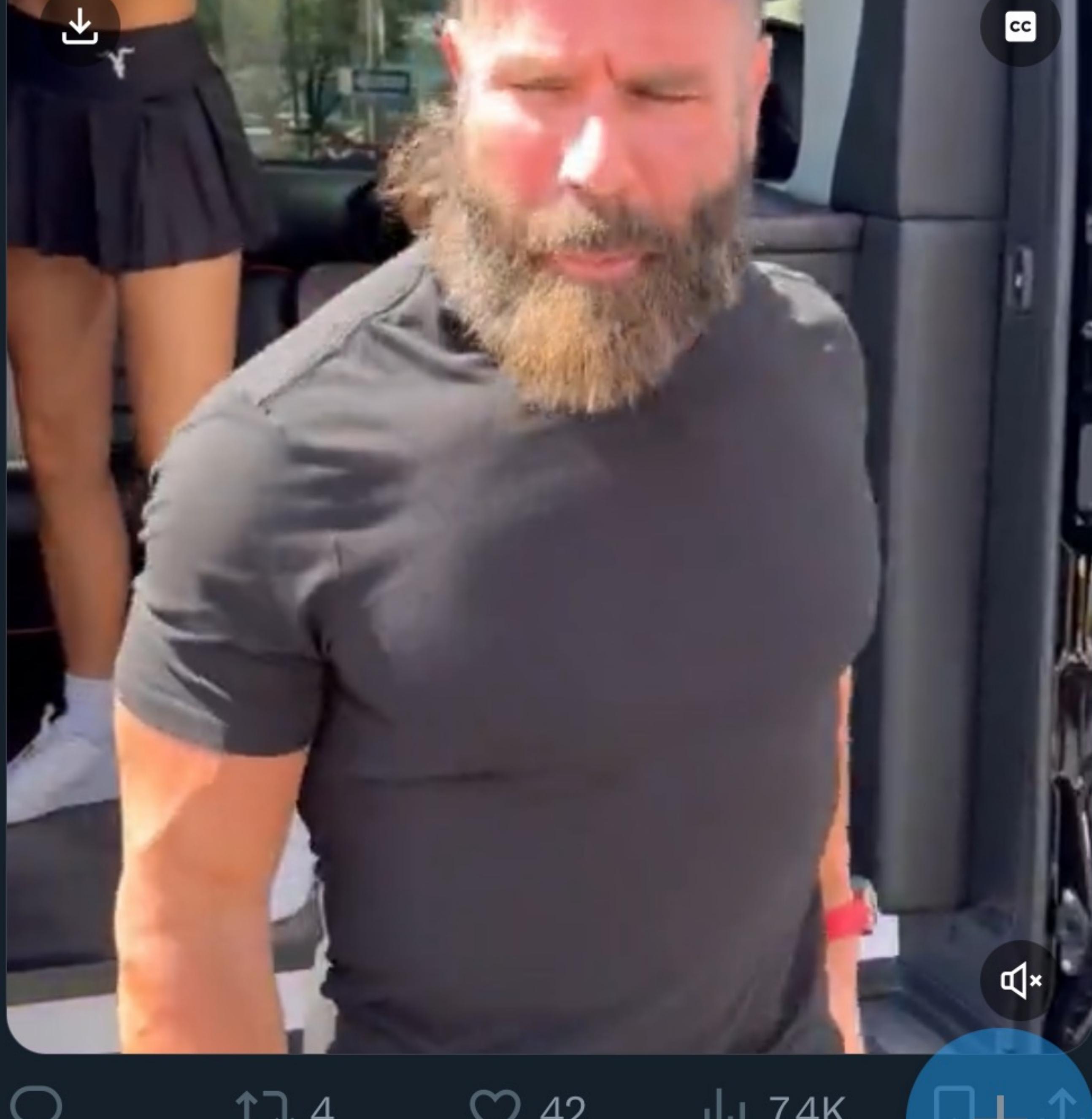
566K



Ignite International @Ignite_Intl · 7/27/23



#TBT to CHAMPS arrival in Vegas 😭



4

42

7.4K



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hyp·no·tize: to capture the whole attention of someone 😊

7:34

📞 59m



51



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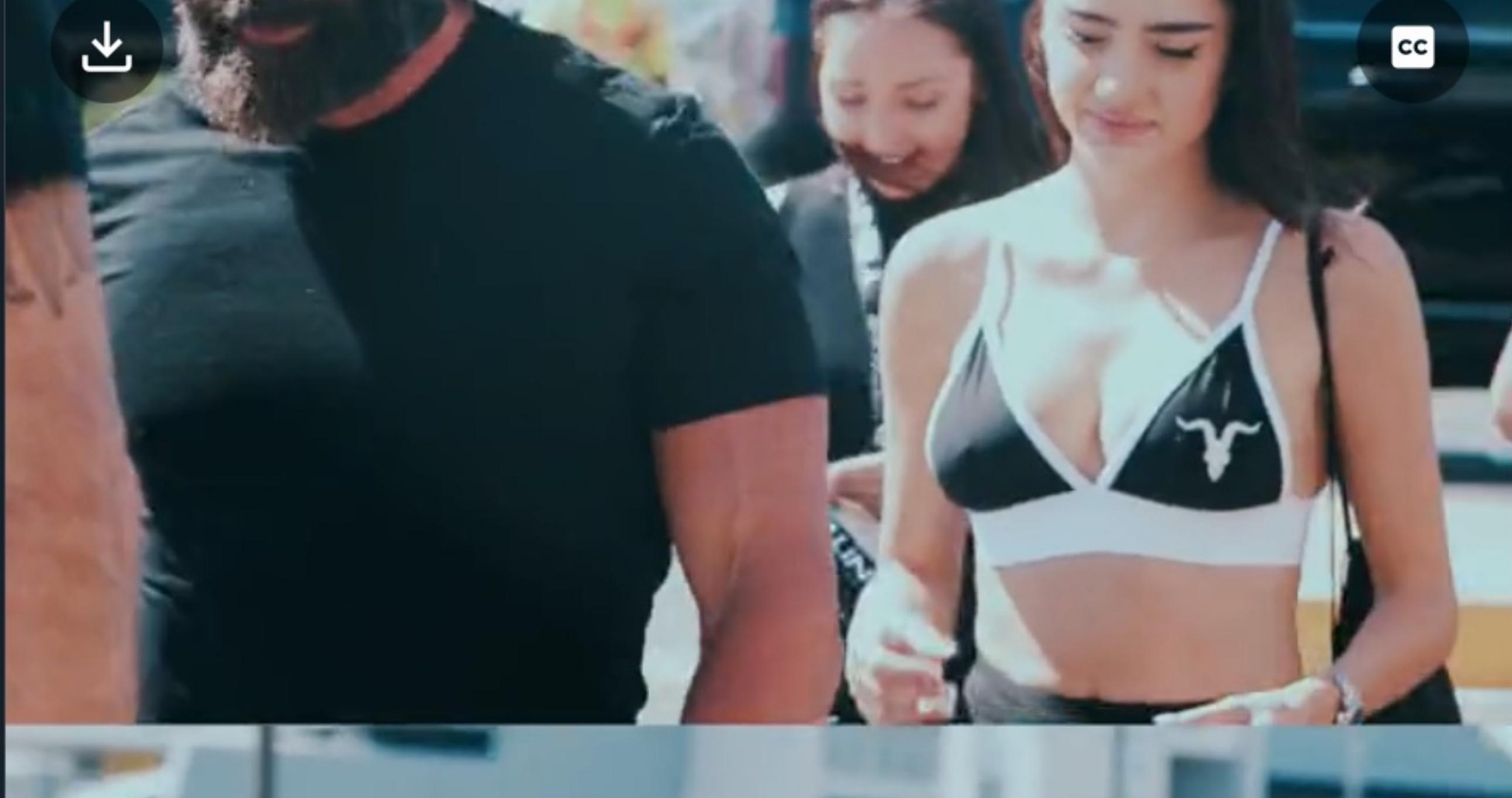
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...

hyp·no·tize: to capture the whole attention of someone 😊



Comment 2 Share 8 45 18K



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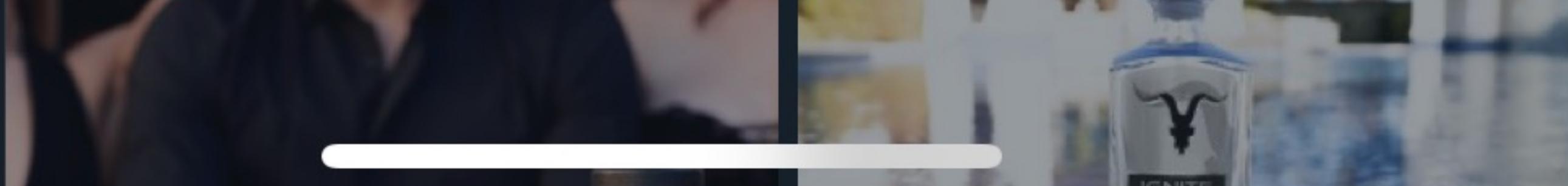
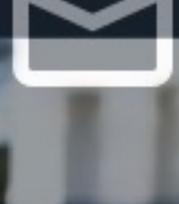
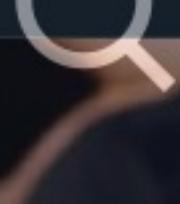
...

Cheers to National Tequila Day!

Bring our award-winning selection into your world



bit.ly/IgniteTequila | #NationalTequilaDay



7:34

📞 59m



51

...

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Dan Bilzerian ✅ @DanBilzerian · 7/20/23

Nothing feels better than winning when people are patiently waiting to see you fail. Ignite vapes now in SA, Africa, EU, UAE, and Russia.



86

273

3.1K

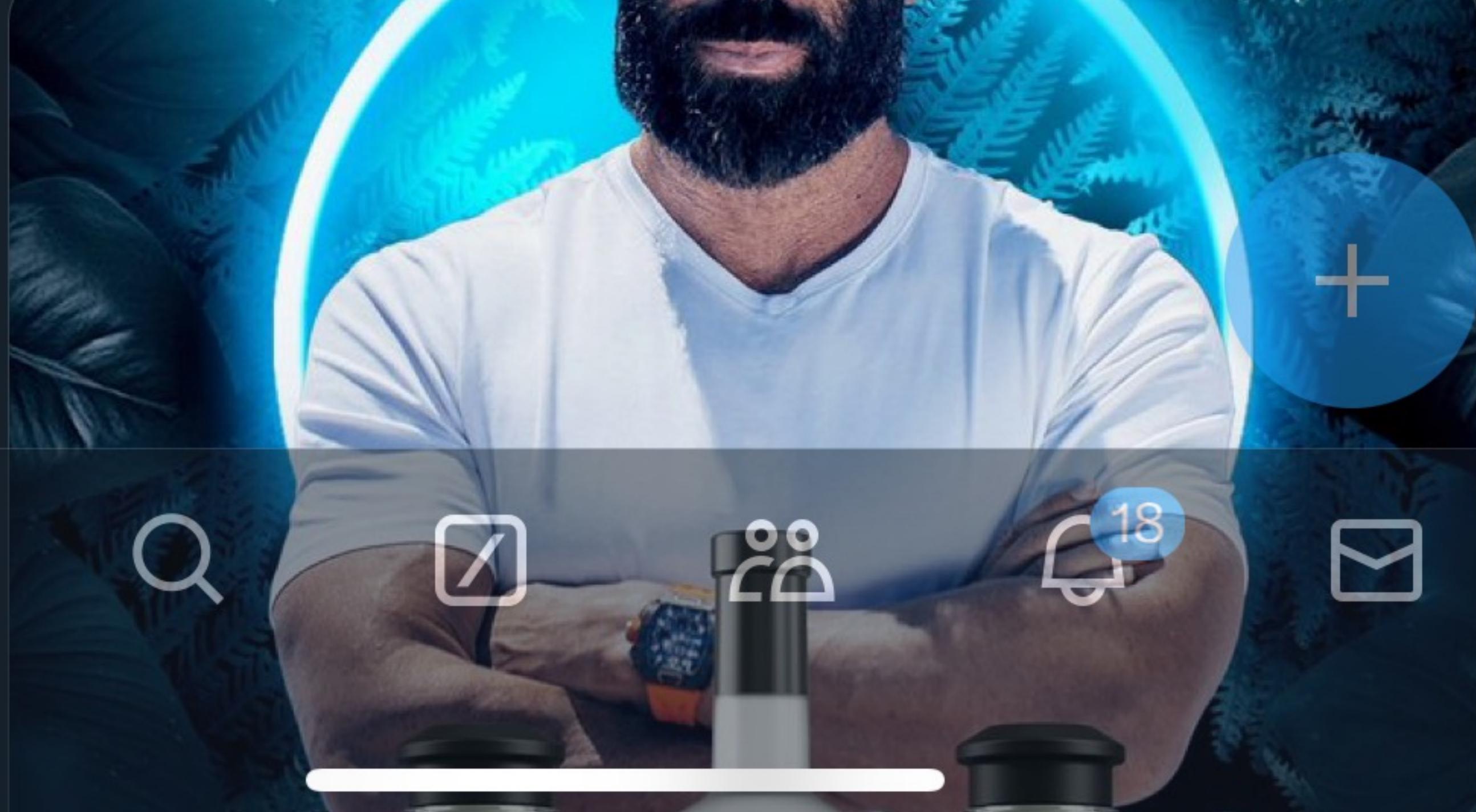
922K



ignite International @Ignite_Intl · 12/13/22

Save the date- See you soon Texas!

...



7:34

📞 59m



51



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1.1K posts



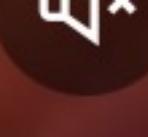
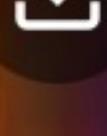
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Dan Bilzerian ✅ @DanBilzerian · 11/24/22 ...

I'm thankful that I've been able to turn all of my dreams into reality



151

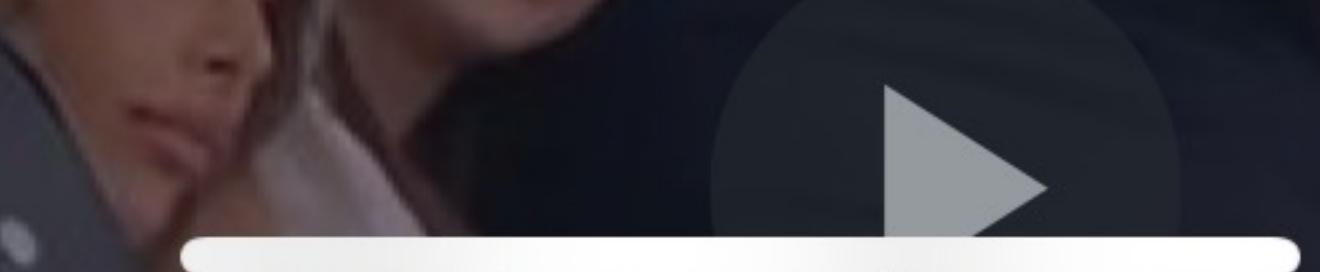
⤒ 627

6.8K



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7:34

59m



51



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...

After witnessing all these wack ass Halloween parties, it's clear imma have to come back and do it right w

@Ignite_intl



7:34

1h



51



ignite International

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THE SETUP by Dan Bilzerian is Available Now for Preorder. ignite.co



0:44



6

10

108



ignite International @Ignite_Intl · 6/21/21 ...

ignitecbd.co/blogs/unapolog...

#ignite #gummy #broadspectrum #isolate
#wellness #igniteyourhealth



7:35

1h



51

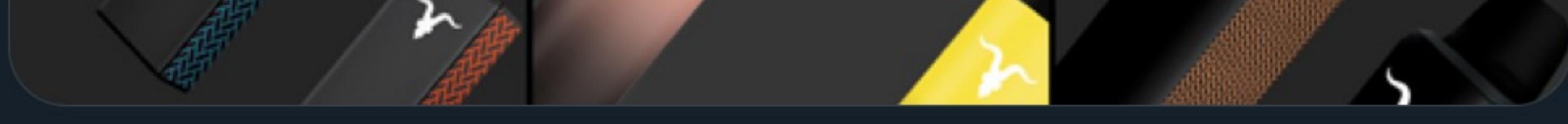


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ZRO delivers an eye-opening burst of smooth, sustained, and controlled “feel good” energy

#igniteyoursenses

bit.ly/3l1W4wr



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wearignite.co/collections/wo...



7:32

57m

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52



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From Matias Ortiz



1

17

6.4K

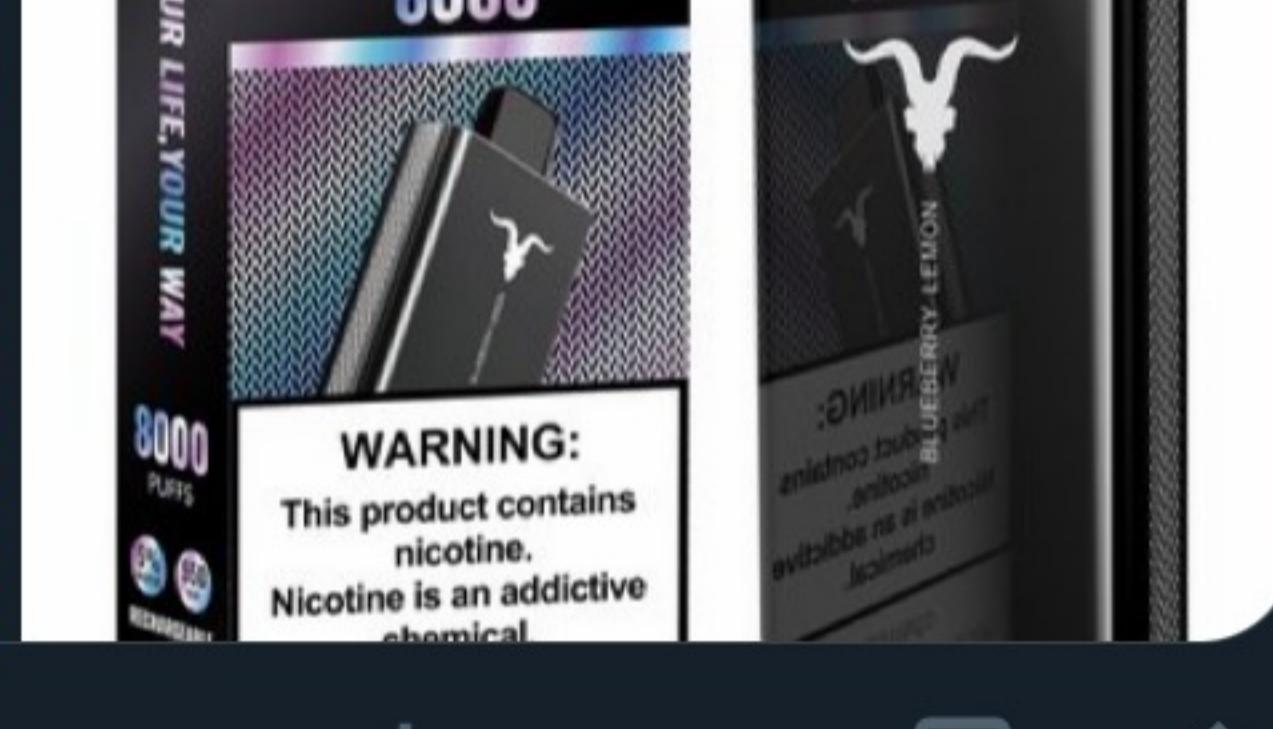


Ignite International @Ignite_Intl · 12/15/23

...

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1

2

27

17K

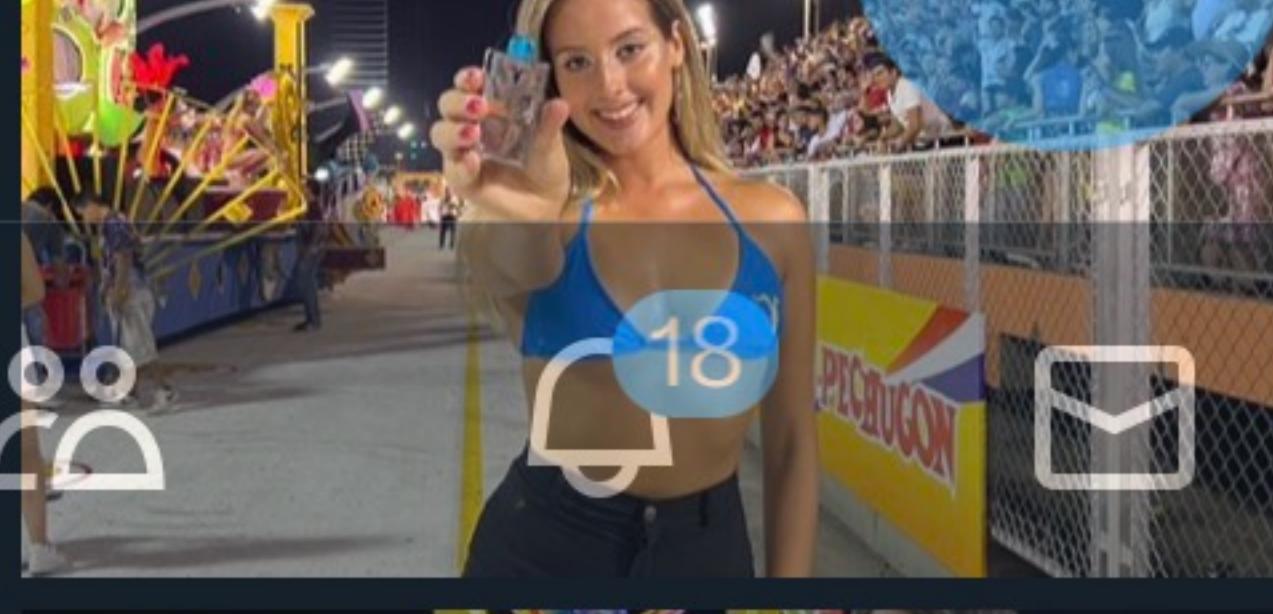
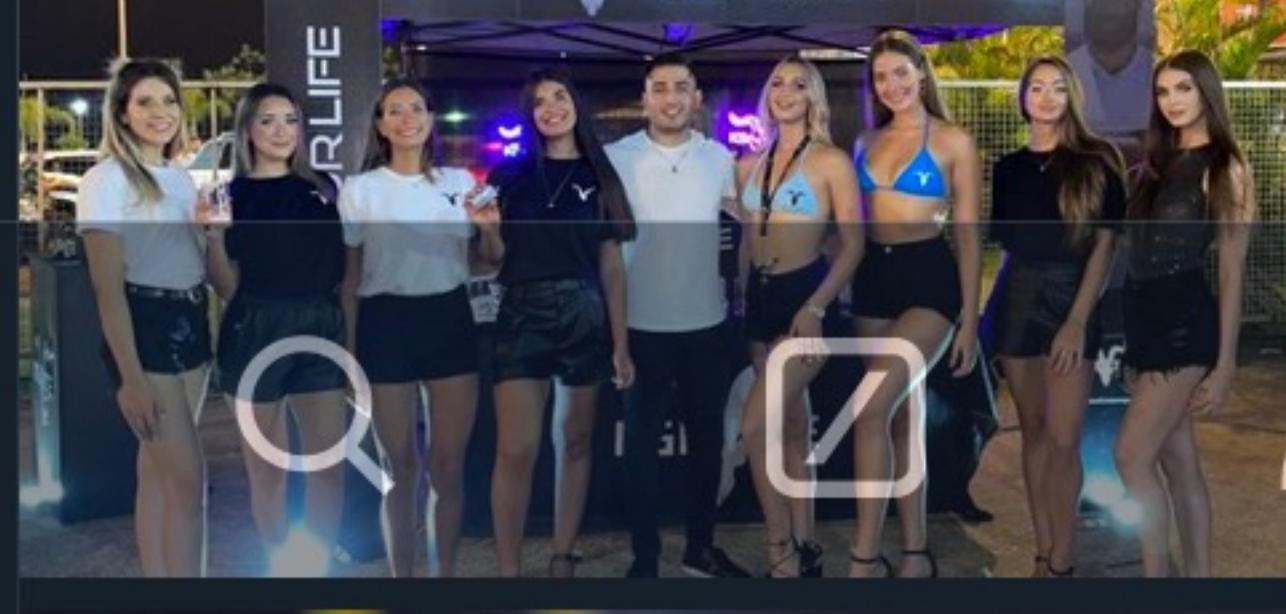


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Matias Ortiz @MatiasOrtiz1912 · 12/7/23

...

#tbt Carnival in the city of Encarnacion, Paraguay ended successfully. Performing brand presence and activation, tastings of Ignite products. Being present at an event of this magnitude helped us get to know businessmen in the area and thus be able to close strategic alliances



7:32

📞 57m

.....



52

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1



8

12K



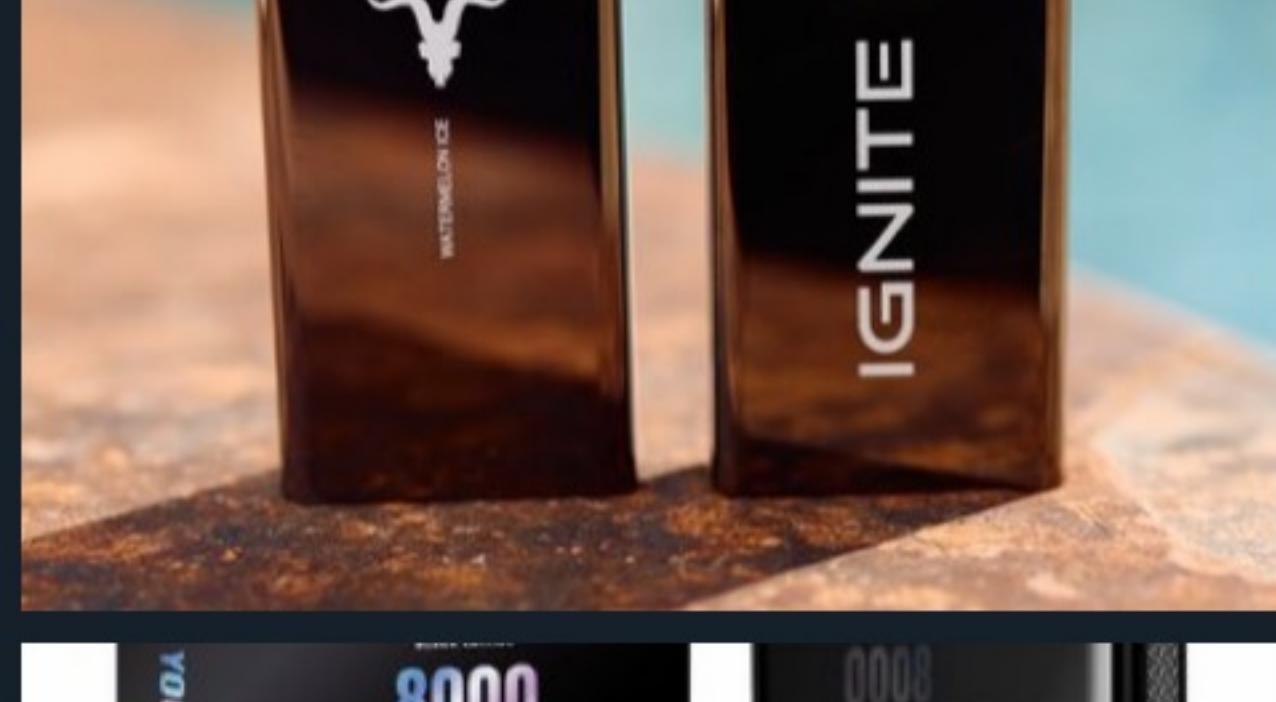
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1

2

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17K



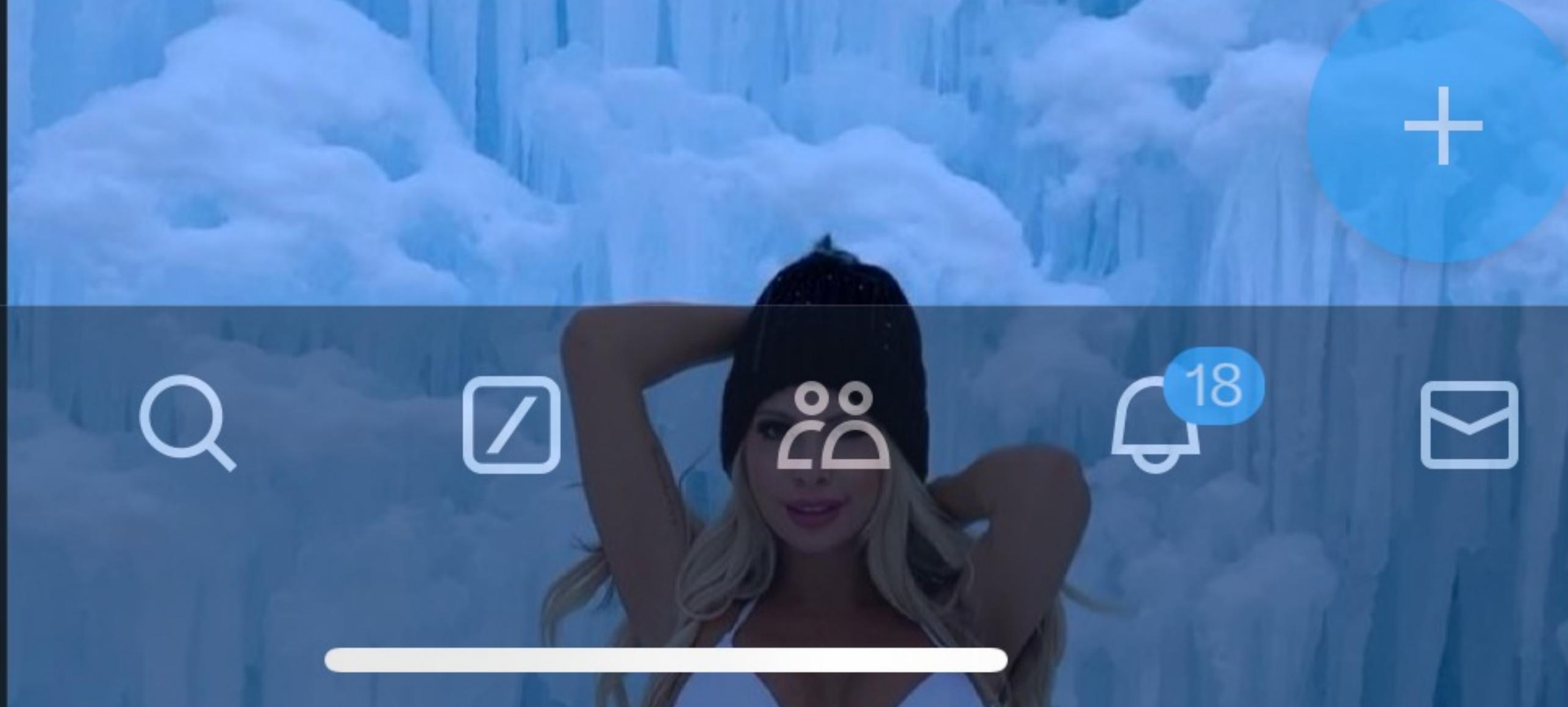
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Lynnie Marie ✅ @MissLynnieMarie · 1/12/19

...

The ice castles were dope ❄️🙌 @IgniteCCo

@DanBilzerian





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1

2

27

17K



Post your reply

7:32

📞 57m

.....



53



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1

16

16K



Ignite International @Ignite_Intl · 12/24/23

Happy Holidays from @Ignite_Intl 🎄

Your Life, Your Way



3

60

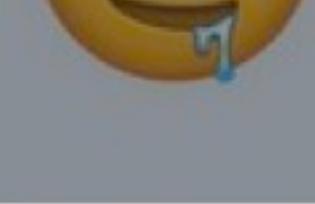
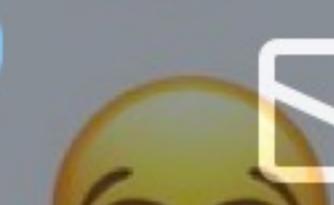
11K



Ignite International @Ignite_Intl · 12/23/23

See you soon 2024

FREQUENTLY USED



7:31

56m



53

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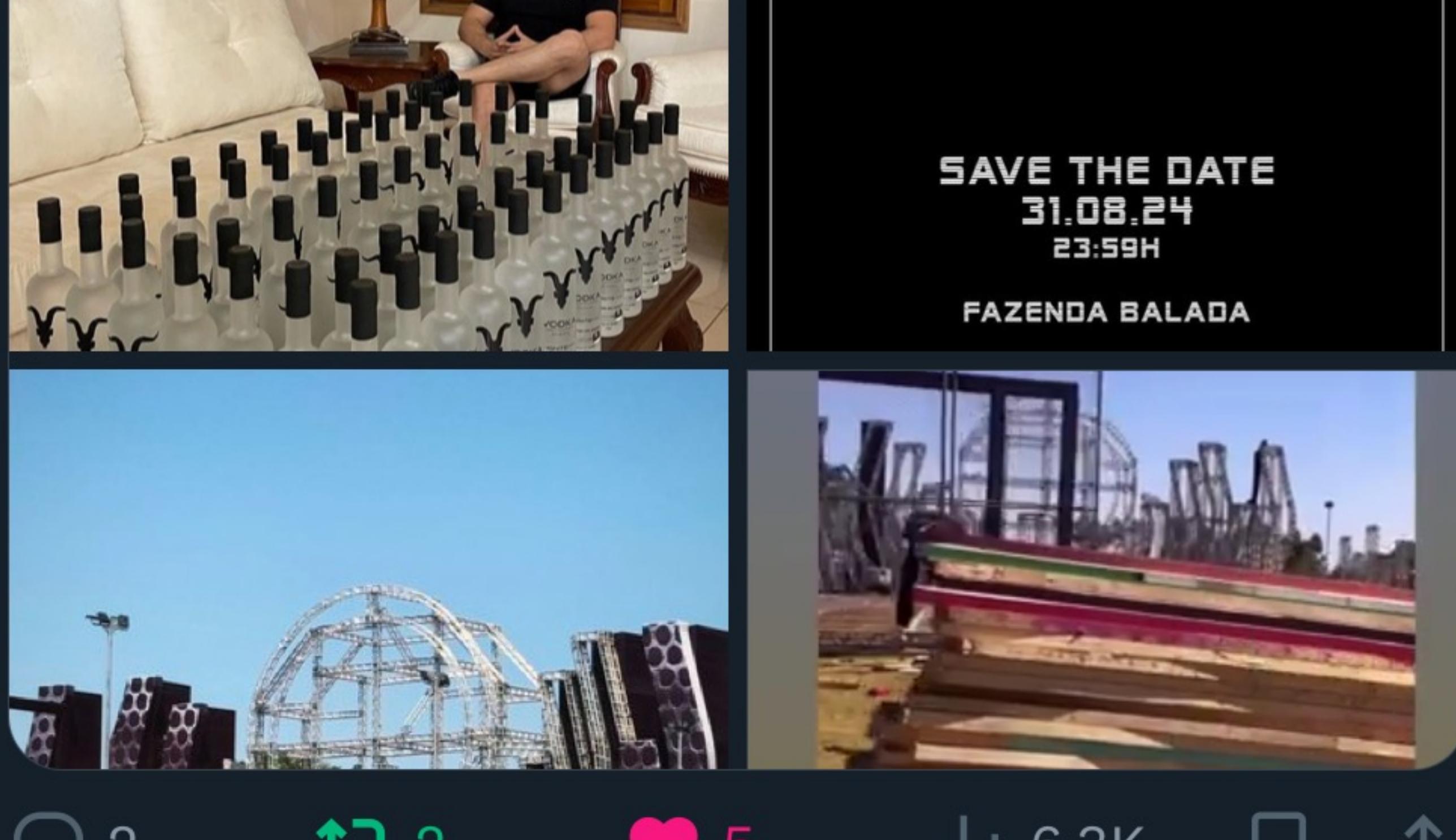


Matias Ortiz @MatiasOrtiz1912 · 8/27/24

...

Official launch of Ignite Vodka in Brazil is coming soon ➡️ SOON

@Ignite_Intl @DanBilzerian @gusttavo_lima TOP



2

2

5

6.3K



⤓ You reposted



Goddess Ellyah ✅ @Goddesselly... · 7/31/24

...

Something HOT is coming soon

Merch @Ignite_Intl ✨

